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7 *Attorney for Defendant*
8 *Jose Mendez*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:19-cr-00295-GMN-NJK

12 Plaintiff,

STIPULATION

13 vs.

14 MARIO CASTRO, JOSE SALUD
15 CASTRO, SALVADOR CASTRO,
16 MIGUEL CASTRO, JOSE LUIS
17 MENDEZ, and ANDREA BURROW

18 Defendants.

19 IT IS HEREBY STIPULATED AND AGREED, by and between
20 Timothy Finley, Trial Attorney, U.S. Department of Justice, counsel for the
21 United States of America, and William H. Brown, counsel for defendant Jose
22 Luis Mendez, as follows:

23 **Emails**

24
25 1. The following defense exhibits are true and correct copies of
26 emails to and from the indicated sender(s) and recipient(s) and are
27
28

admissible in evidence. [Fed. R. Evid. 901(b)(1), (b)(4), 801(d)(1), 803(1), (3),
807]

Exhibit	Bates number
9000	AB-AOLSW-00012293
9001	AB-AOLSW-00018050
9002	AB-AOLSW-00019453
9003	AB-AOLSW-00026970
9004	AB-AOLSW-00019466-68
9005	AB-AOLSW-00021655
9006	AB-AOLSW-00023080-83
9007	AB-AOLSW-00022290
9008	AB-AOLSW-00036957
9009	AB-AOLSW-00025516-17
9010	AB-AOLSW-00026002
9013	AB-AOLSW-00022271
9014	AB-AOLSW-00021341
9015	AB-AOLSW-00021894
9016	AB-AOLSW-00150524
9017	AB-AOLSW-00022257
9018	AB-AOLSW-00017590

9019	AB-AOLSW-00019455
9020	AB-AOLSW-00130752
9022	AB-AOLSW-00053215
9023	AB-AOLSW-00025510
9024	AB-AOLSW-00021631
9025	AB-AOLSW-00105795
9026	AB-AOLSW-00000260
9027	AB-AOLSW-00013720
9031	GOV2314-MSFTSW1-00003224
9033	GOV2314-MSFTSW2-0000561
9034	GOV2314-MSFTSW2-0000527
9035	GOV2314-MSFTSW2-0000539

Text messages on phone

2. Defense Exhibit 9039 is a true and correct copy of text messages on Sean O'Connor's phone, and is admissible in evidence. [Fed. R. Evid. 901(b)(1), (b)(4), 801(d)(1), 803(1), (3), 807]

Checks

3. Defense Exhibit 9011 are true and correct copies of checks written from Advanced Allocation Systems, Inc., to On the Side, Inc., from

1 Bank of America account 1339, and are admissible in evidence. [Fed. R. Evid.
2 902(11)]

3 4. Defense Exhibit and 9012 are true and correct copies of checks
4 written from Advanced Allocation Systems, Inc., to On the Side, Inc., from
5 Bank of America account 7977, and are admissible in evidence. [Fed. R. Evid.
6 902(11)]
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8

9 5. Defense Exhibit and 9021 are true and correct copies of checks
10 written from Pacific Allocation Systems, Inc., to various parties from Bank of
11 America account 6983, and are admissible in evidence. [Fed. R. Evid. 902(11)]
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13 6. Defense Exhibit 9028 is true and correct copy of a check written
14 from Advanced Allocation Systems, Inc., to Patti Kern from Bank of America
15 account 1339, and are admissible in evidence. [Fed. R. Evid. 902(11)]
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17 7. Defense Exhibit 9029 is a true and correct copy of a check written
18 from Advanced Allocation Systems, Inc., to Patti Kern from Bank of America
19 account 8428, and is admissible in evidence. [Fed. R. Evid. 902(11)]
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21 8. Defense Exhibit 9030 is a true and correct copy of a check written
22 from Advanced Allocation Systems, Inc., to Kern and Associates from Bank of
23 America account 7997, and is admissible in evidence. [Fed. R. Evid. 902(11)]
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Patti Kern written statement

9. Defense Exhibit 9032 is a true and correct copy of a handwritten statement by Patti Kern on/about February 21, 2018, and is admissible in evidence. [Fed. R. Evid. 901(b)(1), (4) 902(4), 803(6), 807]

Forfeiture documents

10. Defense Exhibit 9036 is a true and correct copy of a Notice of Seizure of Property and Initiation of Administrative Forfeiture Proceedings from the United States Postal Inspection Service, Petition for Remission or Mitigation of Forfeiture, and Seized Asset Claim Form, and is admissible in evidence. [Fed. R. Evid. 901(b)(7), 902(4), 803(6), 807]

11. Defense Exhibit 9037 is a true and correct copy of a Stipulation for Entry of Order of Forfeiture in *United States v. Patti Kern* (2:19-cr-032-RFB-VCF), and is admissible in evidence. [Fed. R. Evid. 901(b)(1), (b)(4), 807]

Postal Service Documents

12. Defense Exhibit 9038 is a true and correct copies a Complaint, Cease & Desist Order, and Agreement Containing Consent Order to Cease and Desist against Michael Keith Kern, et al. (United States Postal Service, Arlington VA, P.S. Docket No. FR12-254), and is admissible in evidence. [Fed. R. Evid. 901(b)(7), 902(4), 803(6), 807]

Dated: September 22, 2022

JASON M. FRIERSON
United States Attorney

BROWN MISHLER, PLLC

/s/ Timothy Finley

/s/ William H. Brown

By _____
TIMOTHY FINLEY
Trial Attorney, USDOJ

By _____
WILLIAM H. BROWN
Counsel for Jose Luis Mendez

ORDER

IT IS SO ORDERED.

Dated this 22 day of September, 2022.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT